

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF COLUMBIA

UNITED STATES OF AMERICA,

Plaintiff,

v.

PAUL J. MANAFORT, JR.,

Defendant.

Criminal No. 17-cr-201-1 (ABJ)

04 CIV 08918

**VERIFIED STATEMENT OF
INTEREST AND
STATEMENT OF CLAIM**

Claimant the Residential Board of Trump Tower Condominium ("Claimant"), by its attorneys, Belkin Burden Wenig & Goldman, LLP, hereby files, pursuant to 18 U.S.C. §981 and/or 21 U.S.C. §881, this Verified Statement of Interest and Statement of Claim and states as follows:

1. Claimant is a New York condominium's Residential Board of Managers acting on behalf of all residential unit owners in Trump Tower Condominium located at 721-725 Fifth Avenue, New York, New York 10022 (the "Condominium").

2. Paul Manafort and Kathleen Manafort (the "Unit Owners"), as tenants by the entireties, are the record owners of residential unit 43G in the Condominium (the "Unit").

3. Pursuant to Article 6, Section 6.4 of the Condominium's By-Laws (the "By-Laws", owners of units in the Condominium, are liable for the monthly common charges and additional common charges assessed by Claimant with respect to the units ("Common Charges").

4. Pursuant to Article 8, Section 8.1 of the By-Laws, any sale of a



residential unit in the Condominium is conditioned on an owner/seller applying for, and receiving, Claimant's waiver of its right of first refusal with respect to the proposed sale.

5. Pursuant to Article 8, Section 8.10 of the By-Laws, any sale of a residential unit in the Condominium is conditioned on Claimant being paid all Common Charges due on a residential unit as of the date of conveyance.

6. Upon information and belief, on October 10, 2018, a Preliminary Order of Forfeiture with respect to defendant Paul J. Manafort, Jr. was entered in this action, forfeiting the Unit to the United States of America (the "Government").

7. Claimant does not contest the seizure and forfeiture of the Unit with respect to the Unit Owners' right, title and interest in and to the Unit.

8. By virtue of the By-Laws, Claimant has or will have a *bona fide* claim against the Unit prior in time and in right to any claim of the Government, with respect to Claimant's claim for Common Charges that come due during the period that the Government is the owner of the Unit, and its claim for unpaid Common Charges which may be due and unpaid at such time as the Government sells the Unit.

9. By virtue of the By-Laws, Claimant has or will have a *bona fide* claim against the Unit prior in time and in right to any claim of the Government, with respect to Claimant's claim that any sale of the Unit by the Government will be subject to all the terms and conditions of Article 8 of the By-Laws.

10. Claimant does not request a hearing on this claim.

Yours, etc.,

Dated: New York, New York
November 16, 2018

BELKIN BURDEN WENIG & GOLDMAN, LLP
Attorneys for Claimant the Residential Board
of Trump Tower Condominium
270 Madison Avenue
New York, New York 10016
(212) 867-4466 (PH)
(212) 867-0709 (FX)

By: 
Robert T. Holland (RTH #4799)

TO: Andrew Weissmann
Special Counsel's Office
950 Pennsylvania Avenue N.W.
Washington, D.C. 20530

Daniel H. Claman
Principal Deputy Chief, International Unit
Money Laundering and Asset Recovery Section
U.S. Department of Justice
1400 New York Avenue, NW, Suite 10100
Washington, D.C. 20005
(202) 514-6340

VERIFICATION

STATE OF NEW YORK)
 : ss.:
COUNTY OF NEW YORK)

SONJA TALESNIK, being duly sworn, deposes and says:

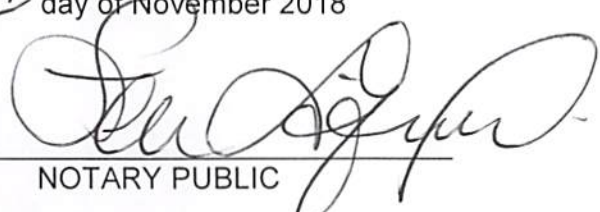
1. I am the Assistant Secretary of the Residential Board of Trump Tower Condominium, a New York Condominium Board of Managers, claimant in this action.

2. I have reviewed the foregoing Statement of Claim and Statement of Interest and to the extent indicated, I have personal knowledge of the allegations set forth in therein. To the extent I do not have such personal knowledge, I am familiar with the efforts made to obtain the information for said Statement of Claim and Statement of Interest. I have reason to believe that the statements made therein are true to the best of my information and belief. Where appropriate, I have relied upon Claimant's attorneys.



SONJA TALESNIK

Sworn to before me this
16th day of November 2018



NOTARY PUBLIC

STEVE LAFIOSCA
Notary Public, State of New York
No. 5005479
Qualified in Rockland County
Commission Expires 12/7/18

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**AFFIDAVIT OF SERVICE BY
REGULAR MAIL**

STATE OF NEW YORK)

: ss.:

COUNTY OF NEW YORK)

ROLANDO MEDINA, being duly sworn, deposes and says:

The deponent is not a party to this action, is over 18 years of age and is employed at 270 Madison Avenue, New York, New York 10016.

That on November 19, 2018, deponent served a true copy of the **VERIFIED STATEMENT OF INTEREST AND STATEMENT OF CLAIM** that was served herein upon:

Andrew Weissman
Special Counsel's Office
950 Pennsylvania Avenue N.W.
Washington, D.C. 20530

Daniel H. Claman
Principal Deputy Chief, International Unit
Money Laundering and Asset Recovery Section
U.S. Department of Justice
1400 New York Avenue, NW, Suite 10100
Washington, D.C. 20005
(202) 514-6340



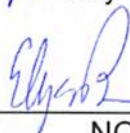
by regular, first class mail by depositing the same in a post-paid, properly addressed envelopes into an official postal depository in the Borough of Manhattan, City and State

of New York, for processing; under the exclusive care and custody of the United States Postal Service within the City and State of New York.



ROLANDO MEDINA

Sworn to before me this
19th day of November 2018



NOTARY PUBLIC

ELYSE BURDEN
Notary Public, State of New York
No. 01BU6012961
Qualified in New York County
Commission Expires September 8, 2022



Belkin Burden Wenig & Goldman, LLP

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Robert T. Holland
Partner
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rholland@bbwg.com

November 20, 2018

BY CERTIFIED MAIL

Clerk
United States District Court for the District of Columbia
333 Constitution Avenue, N.W.
Washington, D.C. 20001

Leave to file GRANTED in 18-mc-0167
Amy B. Jackson 11/28/18

Amy B. Jackson Date
United States District Judge

RE: *USA v. Manafort*
Criminal No. 17-cr-201-1 (ABJ)

To whom it may concern:

This law firm represents the Residential Board of Trump Tower Condominium (the "Board").

Enclosed please find the Board's Verified Statement of Interest and Statement of Claim served in connection with the defendant's forfeiture of his claim to condominium apartment 43G at 721 Fifth Avenue, New York, New York. Proof of service of copies of this document on counsel for the Special Counsel's office and for the Department of Justice is annexed.

Thank you for your kind attention to this matter.

Very truly yours,
Robert T. Holland
Robert T. Holland

enc.

